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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of

Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Sanford, North Carolina))

MM Docket No. 95-135

TO: Chief, Allocations Branch
Mass Media Bureau

REPLY COMMENTS OF
WOOLSTONE CORPORATION TO COUNTERPROPOSAL

Woolstone Corporation (Woolstone) files these reply comments to the *Public Notice*, Rpt. No. 2109 (released October 30, 1995). In the *Public Notice*, the FCC gives notice of Petitioner WWGP Broadcasting Corporation's counterproposal in MM Docket 95-134. Specifically, the counterproposal is described as follows, "Request amendment of FM Table of Allotments to substitute Channel 276A for Channel 288A at Sanford, North Carolina, at coordinates 35° 24' 36"; 79° 15' 34," and the modification of Station WFJA's license accordingly, or the allotment of Channel 276A to Robbins, North Carolina at coordinates 35° 25' 48"; 79° 34' 48." Due to the government shut down, these Reply Comments are timely filed.

Allocation of Channel 276A to Sanford, as requested by Woolstone, would result in allocation of the second commercial FM station to Sanford and the only other competitive FM Sanford station. WWGP Broadcasting Corporation (hereafter WFJA) , the licensee of Radio Station WFJA-FM in Sanford, North Carolina attempts to do two things. First, it attempts to ensure that 276A cannot be used competitively by requesting that Channel 276A be substituted for its current Channel 288A, and that Channel 288A be deleted from the Table of Allotments. In the alternative,

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but less desirable in the eyes of WFJA, WFJA is proposing that Channel 276A be allocated to Robbins, North Carolina, a small community less than 1/20th of the size of Sanford. Allocation of the channel to Robbins would result in allocation of the channel to a community as far from Sanford as the spacing restrictions will allow.

As will be described in greater detail below, neither proposal is in the public interest. Channel 276A should be allocated to Sanford as requested by Woolstone and proposed in the *Notice of Proposed Rulemaking* (released August 21, 1995)(NPRM).

A. Counterproposal OPTION 1

Substitution of Channel 276A for WFJA's Current Channel 288A.

WFJA cloaks what is its readily apparent anti-competitive intent, in the guise of the public interest. WFJA argues that deletion of its current Channel 288 from the Table of Allotments and the substitution of Channel 276A for its use, in lieu of allocation of a new service, is in the public interest. This is not the case.

WFJA's motivations aside, the FCC's allocation policies do not favor WFJA's proposed deletion and substitution. The FCC's priorities in allocating channels are: (1) first full-time aural service; (2) second full-time aural service; (3) first local service; and (4) other public interest matters. *Revision of FM Assignment Policies and Procedures*, 90 FCC2d 88, 51 RR2d 807 (1982). WFJA's proposal does not trigger any of the first three criteria. The analysis rests on "other public interest matters." WFJA premises its public interest showing on two arguments: (1) deletion of Channel 288A would eliminate grandfathered short spacings to first adjacent Station WFMX, Channel 289C, Statesville, North Carolina and second adjacent station WDCG, Channel 286C in Durham, North

Carolina; and (2) substitution of Channel 276A for Channel 288A would allow WFJA to upgrade to 6.0 kw, allowing an increase in service to 16,599 people.

WFJA fails to address, or even acknowledge, the public interest benefits in allocating Channel 276A as a new station to Sanford. These public interest benefits greatly outweigh the proposed deletion/substitution. The deletion of Channel 288A will result in a *loss* of service to 63,620 people in an area of 1,868 square kilometers in WFJA's 60 dbu service contour. *See* Engineering Exhibit 1 at 2. The loss in service to 63,620 people falls woefully short of the proposed gain of 14,461 people which would result if WFJA could upgrade to 6.0 kw on Channel 276A. *See* Engineering Exhibit 1 at 4.

The benefit of eliminating the grandfathered short spacing to WFMX and WDCG is also minimal when compared to the loss in service to 63,620 people. Specifically, elimination of the grandfathered short spacing with WDCG would result in elimination of interference to only 18 people in a 1.7 square kilometer area. *See* WFJA Comments and Counterproposal Technical Exhibit at ¶9. Elimination of the grandfathered short spacing with WFMX would eliminate minimal interference currently received by WFJA from WFMX, which is theoretically prohibiting 1,444 people within WFJA's 1 mv contour from receiving the station. *Id.* at ¶9. In sum, adding the total benefit of additional service to 14,461 people resulting from an upgrade to a 6 kw station, as well as the elimination of interference to 1,462 people, results in a net gain of service to 15,923 people over WFJA's current operation on Channel 288A. This does not even come close to benefitting the public interest when compared to the net loss of service to 63,620 people from the proposed deletion of Channel 288A. In other words, it is hardly beneficial to the public to adopt a proposal which will result in additional service to 15,923 people at the expense of a loss in service to 63,620 people. *See*

Clarksville, Indiana and Linesville, Indiana 4 FCC Rcd 4968 (1989) (Greater population to be served determinative public interest factor in allocating new station.); *See also, Roswell, Georgia* 2 FCC Rcd 2775 (1987).

Not only does WFJA's proposal result in a net loss of service to 47,697 people, but its proposal would deny the public a new voice. Provision of new service is a compelling public interest factor in allocation of broadcast stations.¹ *See Benton, Arkansas*, 3 FCC Rcd 4840 (1988) ("We also restated our policy that a modification of license to upgrade facilities to a superior channel does not create as great a public benefit as that of a new primary service.") *See also Apalachicola, Florida*, 6 FCC Rcd 7147, 7148 (1990) ("In the absence of such a showing of need for the proposed increase in service [for an upgrade], a conflicting new allotment would be favored since it represents a new service.") Furthermore, the Commission will not delete a channel absent a compelling showing. *See Spencer, Minnesota*, 10 FCC Rcd 3334 (released March 28, 1995) ("It is long

¹ Woolstone notes that, if the FCC adopts WFJA's proposal to delete Channel 288 and substitute Channel 276A, an opportunity must be given to the public and to all other interested parties to apply for 276A.

The Commission's rules provide that a licensee or permittee may petition the Commission for an amendment to the FM and Television table of allotments, in modification of its license accordingly, without placing its existing authorization at risk. This procedure is limited to situations in which the new allotment would be mutually exclusive with the existing allotment and does not apply to non-adjacent channel upgrades.

See Saltville, Virginia, 10 FCC Rcd 7578 at n. 7 (1995). Channel 276A is not adjacent to 288A, nor is it mutually exclusive. *See also Tawas City, Michigan*, 10 FCC Rcd 6108 (released June 9, 1995).

established Commission policy not to delete a channel from a community where interest in its use has been expressed absent a compelling public interest benefit.")²

B. Counterproposal OPTION 2

Allocation of Channel 276A to Robbins, North Carolina

WFJA proposes that Channel 276A be allocated to Robbins, North Carolina.³ The public interest does not support allocation of Channel 276A to Robbins, a small community 36 kilometers southwest of Sanford. A maximum Class A facility at Robbins, North Carolina, would provide 1 mv/m service to 53,598 people in an area of 2,542 square kilometers. *See* Engineering Exhibit at 4. Woolstone's proposal to allocate the channel to Sanford will result in service to 77,453 people -- approximately 24,000 more. *Id.* This represents nearly a 50 percent more efficient use of the spectrum in the total number of people served.

² WFJA cites *Columbia, South Carolina* 2 FCC Rcd 2176 (1987) as support for elimination of grandfathered short spacing as a basis for substitution of Channel 276A for 288A. Woolstone notes that in *Columbia*, the proposal involved the elimination of interference to 12,000 people, resulted in improved service to an additional 107,000 people, and the allocation of two new stations to other communities. Here, WFJA's proposal would result in the elimination of interference to only approximately 1,462 people, would result in a net loss in service to 47,697 people, and would result in the allocation of *no* new channels to other communities.

³ WFJA has failed to make the requisite expression of interest in the allotment of Channel 276A to Robbins, North Carolina as required by Commission Rules. *See Midway, Florida*, 10 FCC Rcd 6112 (1995) ("Absent a *bona fide* expression of interest, we will not allot a Channel.") *See also Littlefield, Texas*, 10 FCC Rcd 6598 (1995). Nowhere in the text of WFJA's Comments and Counterproposal has WFJA expressed an intent to apply for and build the station. In the technical exhibit, WFJA's engineer claims that WFJA will file an application. However, this statement has not been made by the petitioner or the petitioner's counsel as agent for petitioner. Indeed, Rule 1.52 states, or certainly implies, that unless a commitment or statement is made on behalf of a petitioner by counsel, the petitioner must specifically verify all statements by affidavit.

Although Robbins has no local broadcast outlets, it is a small community of only 970 people based on the 1990 census. It has lost nearly 300 people since the 1980 census. Robbins is less than 1/22nd the size of Sanford, which has a population of 22,000.⁴ The need for an additional second FM commercial service to the much larger community of Sanford outweighs the allocation of a first service to Robbins. This is particularly true since Robbins receives nine full-time FM services as well as service from many AM stations. *See, Engineering Statements, see also; St. Augustine, Florida*, 46 RR2d 1295,1297 (1980) (Allocation of a second FM service to St. Augustine with a population of 12,352 preferred over allocation of a first station to Callahan, Florida with a total population of 772.); *See also, Wilmer E. Huffman*, 22 RR2d 820,822 (1962).

C. Conclusion.

WFJA's first counterproposal to substitute Channel 276A for 288A and to delete 288A from the Table of Allotments is clearly not in the public interest. It is a proposal that maximizes WFJA's self interest by eliminating any potential competition at the expense of new service to the public. WFJA's proposal would: (1) result in a net loss in service to 47,697 people as compared to allocation of Channel 276A to Sanford; (2) would require deletion of a station; and (3) would deny the public the benefit of the service of a new station.

Similarly, WFJA's attempt, in the alternative, to allocate 276A to a community as far from Sanford as possible must be rejected. This counterproposal must be rejected since no proper

⁴ Robbins is also undeserving of allocation of its own radio station when compared to other communities within Moore County. Robbins is located in Moore County which consists of 10 townships. There are other far-larger communities within Moore County. *See* Census data, Exhibit 2. The Commission's allocation scheme, as envisioned by the Communications Act, is not advanced by allocation of a scarce channel to Robbins.


expression of interest has been made. More importantly, the public interest warrants allocation of a second commercial FM service to the much larger community of Sanford than the allocation of a first allocation to the very small community of Robbins, North Carolina. Both communities are already well served by existing service, but allocation of Channel 276 to Sanford will result in service to an additional 24,000 people representing a nearly 50 percent more efficient use of the channel than if allocated to Robbins.

WHEREFORE, Channel 276A should be allotted to Sanford, North Carolina as that community's second FM service. Woolstone will file for the channel if allocated to Sanford and, if its application is granted, will expeditiously construct the station.

Respectfully submitted,

WOOLSTONE CORPORATION

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By 
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Its Attorney

November 20, 1995

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EXHIBIT 1

du Treil, Lundin & Rackley, Inc.

A Subsidiary of A.D. Ring, P.A.

**TECHNICAL STATEMENT SUPPORT REPLY COMMENTS
IN MM DOCKET NO. 95-134
PREPARED FOR
WOOLSTONE CORPORATION
SANFORD, NORTH CAROLINA**

This Technical Statement has been prepared on behalf of Woolstone Corporation, in support of a rule making petition to allot FM broadcast channel 276A to Sanford, NC (RM-8679). These comments pertain particularly to Comments and Counterproposal of WWGP Broadcasting Corporation (herein "WFJA") dated October 11, 1995.

WFJA suggests two options for use of FM channel 276A which is proposed for allotment to Sanford, NC by the Woolstone Corporation ("Woolstone") as the city's second local FM service. WFJA first proposes substitution of channel 276A for its inferior channel 288A, or as an alternative, to allot the channel to the distant small community of Robbins, NC. Both proposals will be addressed.

Substitution of Channel 276A for WFJA's 288A.

This substitution of channels, although admittedly relieving WFJA of two short spacing difficulties, does little for the public. Currently, WFJA provides 60 dBu service to 63,620 persons in an area of 1868 square kilometers. Assuming use of channel 276A at a

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site southwest of Sanford meeting separation requirements, WFJA would provide 60 dBu service to 78,081 persons in an area of 2486 square kilometers. The increase in coverage includes 14,461 persons. Due to siting requirements, 939 persons currently receiving WFJA's signal would be outside of the proposed 60 dBu contour. WFJA skillfully proposed a site closer to the separation requirement than proposed by Woolstone so as to minimize the potential loss area. If a site meeting this requirement is unavailable, the loss of existing coverage could be greater.

On the other hand, Woolstone at the reference coordinates for channel 276A in the rule making, would provide a new FM service to 77,453 persons in the area of 2,529 square kilometers within the proposed 60 dBu contour. The Woolstone proposal is obviously more beneficial from the viewpoint of coverage.

Sanford, NC is claimed by WFJA to have four local services, two FM stations and two AM stations. One of the FM stations is a noncommercial educational station not considered in rule making matters. The FCC in the Notice of Proposed Rule Making, correctly states that the allotment of channel 276A would be "...the community's second local FM service". The two local AM stations are licensed for daytime-only operation; therefore, Sanford has but three local daytime services and only one local nighttime aural service.

Allotment of Channel 276A to Robbins, NC.

As a second option, WFJA suggests allotting channel 276A to Robbins, a community of 970 persons

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according to the 1990 Census, located approximately 36 kilometers southwest of Sanford. In 1980, Robbins had a population of 1,256 persons and 1,059 persons in 1970. It is not a very large city, and like most cities of that size does not have a local aural outlet.

Robbins has coverage from numerous AM and FM stations. For example, the following nine commercial FM stations located in North Carolina provide a 60 dBu or greater signal to the city:

WIOZ-FM	Southern Pines	295C2
WKRR	Asheboro	222C
WMAG	High Point	258C
WPCM	Burlington	266C
WQMG-FM	Greensboro	246C
WZZU	Burlington	230C
WDCG	Durham	286C
WKSI	Greensboro	254C
WFXF	High Point	262C

An assumed full facility Class A station on channel 276A, located at the Robbins reference coordinates would provide a new service to 53,598 persons in an area of 2,542 square kilometers, approximately 24,000 fewer persons than with the Woolstone proposal. The potential for service to more persons at Sanford is quite obvious.

A station operating on channel 276A at Sanford and employing maximum Class A facilities would easily include Robbins within its 60 dBu coverage area, thereby providing a new service to the community. As the community is so small, a premium grade of signal, 70 dBu,

normally required to be provided to a station's city of license would be utterly wasted. The FCC requirement for the premium signal to a community of license is desired in order to overcome man-made noise and urban clutter, clearly a situation which does not exist in extremely small cities with population in the one thousand persons range.

Conclusions.

The use of channel 276A by WFJA results in misuse of valuable spectrum. Additionally, allotment of a channel to a tiny community - Robbins, NC - does not foster the goal of fair and equal distribution of facilities. The allotment of channel 276A to Sanford, NC as proposed by Woolstone is the only proper use of this FM broadcasting channel.



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October 26, 1995

EXHIBIT 2

Table 1. Selected Social Characteristics: 1990—Con.

(Data based on sample and subject to sampling variability, see text. For definitions of terms and meanings of symbols, see first.)

State County County Subdivision Place	All persons		Persons 5 years and over		Persons who speak a language other than English at home		Family households		Female householder, no francophone tenant	
	Total	Percent foreign born	Native	Percent living in different house in 1985	Persons 5 to 17 years	Persons 18 years and over	Total	Percent with own children under 18 years		
										Married-couple family
Macclintock County--Con.										
Township 4, Shaw	14 953	3.2	14 074	77.2	157	445	4 292	59.6	137	68.6
Township 5, Rowan	1 634	3.8	1 615	75.7	13	39	541	61.6	15	60.0
Township 6, Rowan	3 671	4.2	3 525	75.6	25	131	1 093	49.9	34	52.9
Township 7, Rowan	15 896	1.8	15 035	95.1	122	370	4 846	53.4	324	59.9
Township 8, Rowan	9 654	1.7	9 248	95.7	164	179	2 648	51.4	221	64.4
Township 9, Rowan	15 851	4.4	14 846	93.8	164	737	3 189	48.1	253	60.4
Township 10, Rowan	8 919	2.8	8 222	92.3	76	310	2 573	45.0	183	37.4
Township 11, Rowan	1 343	1.4	1 280	95.3	11	37	383	37.7	71	35.2
Township 12, Rowan	4 845	1.4	4 445	91.8	76	211	1 493	49.6	104	48.8
Township 13, Rowan	2 054	1.4	1 935	94.2	22	42	689	40.1	104	48.8
Township 14, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 15, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 16, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 17, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 18, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 19, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 20, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 21, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 22, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 23, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 24, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 25, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 26, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 27, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 28, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 29, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 30, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 31, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 32, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 33, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 34, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 35, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 36, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 37, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 38, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 39, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 40, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 41, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 42, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 43, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 44, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 45, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 46, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 47, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 48, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 49, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 50, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 51, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 52, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 53, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 54, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 55, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 56, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 57, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 58, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 59, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 60, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 61, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 62, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 63, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 64, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 65, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 66, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 67, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 68, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 69, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 70, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 71, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 72, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 73, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 74, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 75, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 76, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 77, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 78, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 79, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 80, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 81, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 82, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 83, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 84, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 85, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 86, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 87, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 88, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 89, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 90, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 91, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 92, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 93, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 94, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 95, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 96, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 97, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8
Township 98, Rowan	3 691	1.7	3 537	95.8	54	169	1 998	43.0	479	51.1
Township 99, Rowan	6 122	1.5	5 747	93.9	54	192	1 831	33.6	452	27.9
Township 100, Rowan	2 054	1.7	1 935	94.2	22	42	689	40.1	104	48.8

Characteristics: 1990 - Con

used above to make and select in something variable, see list. For definition of terms and meanings of symbols, see list


State County County Subdivision Place	All persons		Persons 5 years and over		Persons who speak a language other than English at home		Family households		Female householders, no husband present	
	Total	Percent foreign born	Total	Percent living in different house in 1965	Total	Percent who do not speak English well	Total	Percent with own children under 18 years	Total	Percent with own children under 18 years
Deer County—City	2,410	1.9	2,240	45.9	47	63.0	452	44.9	523	49.3
Township 6, Greenwood	13,767	1.9	12,792	29.7	217	34.9	3,467	39.1	3,456	45.6
Township 7, Adams	6,775	1.9	6,370	30.9	108	19.4	1,106	34.8	1,278	30.5
Township 8, Adams	1,268	2.9	1,270	37.2	32	18.9	1,107	47.2	1,107	47.2
Township 9, Adams	2,700	3.6	2,555	41.4	89	25.8	3,755	41.1	2,891	43.1
Township 10, Adams	862	7.7	814	36.1	15	6.7	271	48.2	215	44.2
Township 11, Adams	327	6.8	318	36.6	14	11.1	126	11.1	116	11.9
Township 12, Adams	339	5.1	324	48.7	61	61.7	711	50.2	638	54.7
Township 13, Adams	12,359	2.6	11,851	48.7	345	17.1	4,136	19.5	3,813	23.9
Township 14, Adams	339	2.9	325	34.0	19	21.1	118	19.5	116	19.5
Township 15, Adams	4,746	4.2	4,665	66.2	16	13.2	1,717	13.2	1,644	13.0
Township 16, Adams	2,044	3.9	1,900	51.7	13	13.2	801	13.2	765	11.5
Township 17, Adams	589	4.4	512	21.4	64	6.4	157	50.8	144	59.6
Township 18, Adams	1,832	2.2	1,732	54.3	64	6.4	587	27.6	490	39.2
Township 19, Adams	16,477	1.9	15,401	41.9	145	39.5	21,357	47.2	14,578	44.4
Township 20, Adams	2,543	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 21, Adams	1,331	1.9	1,268	34.4	110	20.0	1,770	48.2	1,441	42.9
Township 22, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 23, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 24, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 25, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 26, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 27, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 28, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 29, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 30, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 31, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 32, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 33, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 34, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 35, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 36, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 37, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 38, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 39, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 40, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 41, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 42, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 43, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 44, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 45, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 46, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 47, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 48, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 49, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 50, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 51, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 52, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 53, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 54, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 55, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 56, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 57, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 58, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 59, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 60, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 61, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 62, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 63, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 64, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 65, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 66, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 67, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 68, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 69, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 70, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 71, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 72, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 73, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 74, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 75, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 76, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 77, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 78, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 79, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 80, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 81, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 82, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 83, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 84, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 85, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 86, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 87, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 88, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 89, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 90, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 91, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 92, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 93, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 94, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 95, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 96, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 97, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 98, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 99, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 100, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 101, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 102, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 103, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 104, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 105, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 106, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 107, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 108, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 109, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 110, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 111, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 112, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 113, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 114, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 115, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 116, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,811	42.9
Township 117, Adams	2,487	1.9	2,320	34.4	110	20.0	3,441	48.2	2,8	

CERTIFICATE OF SERVICE

I, Janet Shih, in the law offices of Gammon & Grange, hereby certify that I have sent, this 20th day of November 1995 by first-class, postage-prepaid, U.S. Mail, copies of the foregoing REPLY COMMENTS OF WOOLSTONE CORPORATION TO COUNTERPROPOSAL to the following:

Ms. Leslie Shapiro
Allocations Branch
Policy and Rules Division
Federal Communications Commission
2000 M Street, N.W., Room 554
Washington, D.C. 20554

Mark J. Prak, Esq.
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Janet Shih